TDD# F-6-8704-18 file

POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION	SITE NUMBER (To be assigned by HQ)
VI	TX1161630644

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (*Preliminary Assessment*). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (*EN-335*), 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME	B. STREET (or other identifier)		
Gary Job Corps Center	State Hwy 21, 1 mi. NE of San Marcos, TX		
C. CITY	**D. STATE**	**E. ZIP CODE**	**F. COUNTY NAME**
San Marcos	TX	78666	~~Hays~~ Caldwell

G. OWNER/OPERATOR (*If known*)
1. NAME: Dept. of Labor, Dick Moncure, Environmental Coordinator
2. TELEPHONE NUMBER: (512)396-6544

H. TYPE OF OWNERSHIP
[X] 1. FEDERAL [ ] 2. STATE [ ] 3. COUNTY [ ] 4. MUNICIPAL [ ] 5. PRIVATE [ ] 6. UNKNOWN

I. SITE DESCRIPTION Vocational training center for economically depressed youth. The training center occupies a portion of a former WWII era military air base.

J. HOW IDENTIFIED (*i.e., citizen's complaints, OSHA citations, etc.*)
Pollution control screening visit by Jim Highland, See Attachment A. (IX, B, 1)

K. DATE IDENTIFIED (*mo., day, & yr.*): 4/9/85

L. PRINCIPAL STATE CONTACT
1. NAME: Vernon R. Francis TWC
2. TELEPHONE NUMBER: (512)226-3297

II. PRELIMINARY ASSESSMENT (*complete this section last*)

A. APPARENT SERIOUSNESS OF PROBLEM
[ ] 1. HIGH [ ] 2. MEDIUM [ ] 3. LOW [ ] 4. NONE [X] 5. UNKNOWN

B. RECOMMENDATION
[ ] 1. NO ACTION NEEDED (*no hazard*)
[ ] 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY:
[ ] 3. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY:
[X] 4. SITE INSPECTION NEEDED (*low priority*)
(See attachment A)

C. PREPARER INFORMATION
1. NAME: Terry D. Pierce ICF Technology
2. TELEPHONE NUMBER: (214)744-1641
3. DATE (*mo., day, & yr.*): 5/1/87

III. SITE INFORMATION

A. SITE STATUS
[ ] 1. ACTIVE (*Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.*)
[ ] 2. INACTIVE (*Those sites which no longer receive wastes.*)
[X] 3. OTHER (*specify*): No regular or continuing use. (*Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.*)

90067167

B. IS GENERATOR ON SITE?
[X] 1. NO [ ] 2. YES (*specify generator's four-digit SIC Code*)

C. AREA OF SITE (*in acres*)	D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES	
	1. LATITUDE (*deg.—min.—sec.*)	2. LONGITUDE (*deg.—min.—sec.*)
817	29°53'07"N	97°52'15"W

E. ARE THERE BUILDINGS ON THE SITE?
[ ] 1. NO [X] 2. YES (*specify*): dormitories, service and educational buildings, dining halls, and shops.

Continue On Reverse

Continued From Front

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

	A. TRANSPORTER		B. STORER		C. TREATER		D. DISPOSER
	1. RAIL		1. PILE		1. FILTRATION	X	1. LANDFILL
	2. SHIP		2. SURFACE IMPOUNDMENT		2. INCINERATION		2. LANDFARM
	3. BARGE		3. DRUMS		3. VOLUME REDUCTION		3. OPEN DUMP
	4. TRUCK		4. TANK, ABOVE GROUND		4. RECYCLING/RECOVERY		4. SURFACE IMPOUNDMENT
	5. PIPELINE		5. TANK, BELOW GROUND		5. CHEM./PHYS. TREATMENT		5. MIDNIGHT DUMPING
	6. OTHER (specify):	X	6. OTHER (specify): 1 storage yard 2 warehouse		6. BIOLOGICAL TREATMENT		6. INCINERATION
					7. WASTE OIL REPROCESSING		7. UNDERGROUND INJECTION
					8. SOLVENT RECOVERY	X	8. OTHER (specify): Tetraethyl lead buried by former military occupants.
					9. OTHER (specify):		

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

Approximately 250 electrical power transformers were inherited from the former military occupants. During the mid-1950's, the former military occupants buried Tetraethyl lead at the center.

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1. UNKNOWN ☒ 2. LIQUID ☐ 3. SOLID ☐ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☐ 1. UNKNOWN ☐ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE
☒ 6. TOXIC ☐ 7. REACTIVE ☐ 8. INERT ☐ 9. FLAMMABLE

☐ 10. OTHER (specify): _____

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

395 electrical power transformers (inventory by GJCC)

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT: None	AMOUNT: None	AMOUNT: None	AMOUNT: 395	AMOUNT: None	AMOUNT: Unknown
UNIT OF MEASURE:	UNIT OF MEASURE:	UNIT OF MEASURE:	UNIT OF MEASURE: transformers	UNIT OF MEASURE:	UNIT OF MEASURE:
(1) PAINT, PIGMENTS	(1) OILY WASTES	(1) HALOGENATED SOLVENTS	(1) ACIDS	(1) FLYASH	(1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	X (5) OTHER (specify): Tetraethyl lead
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			X (9) PCB		
			(10) METALS		
			(11) OTHER (specify)		

Continued From Page 2

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).

PCB
Tetraethyl lead

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

See Attachment A.

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER	X			Percolation of contaminants possible.
8. CONTAMINATION OF SURFACE WATER				
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS				
13. CONTAMINATION OF SOIL		X	4/9/87	Observed by Jim Highland. See Attachment A (V. C. 4)
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION				
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS		X	4/9/87	Observed by Jim Highland. See Attachment A (V.C. 4)
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

Continue On Reverse

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

Unknown

☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☐ 3. STATE PERMIT (specify): _____

☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER

☐ 7. RCRA STORER ☐ 8. RCRA TREATER ☐ 9. RCRA DISPOSER

☐ 10. OTHER (specify): _____

B. IN COMPLIANCE?

☐ 1. YES ☐ 2. NO ☒ 3. UNKNOWN

4. WITH RESPECT TO (list regulation name & number): _____

VIII. PAST REGULATORY ACTIONS

☒ A. NONE ☐ B. YES (summarize below)

IX. INSPECTION ACTIVITY (past or on-going)

☐ A. NONE ☒ B. YES (complete items 1,2,3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
See Attachment A			

X. REMEDIAL ACTIVITY (past or on-going)

☐ A. NONE ☒ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
See Attachment A			

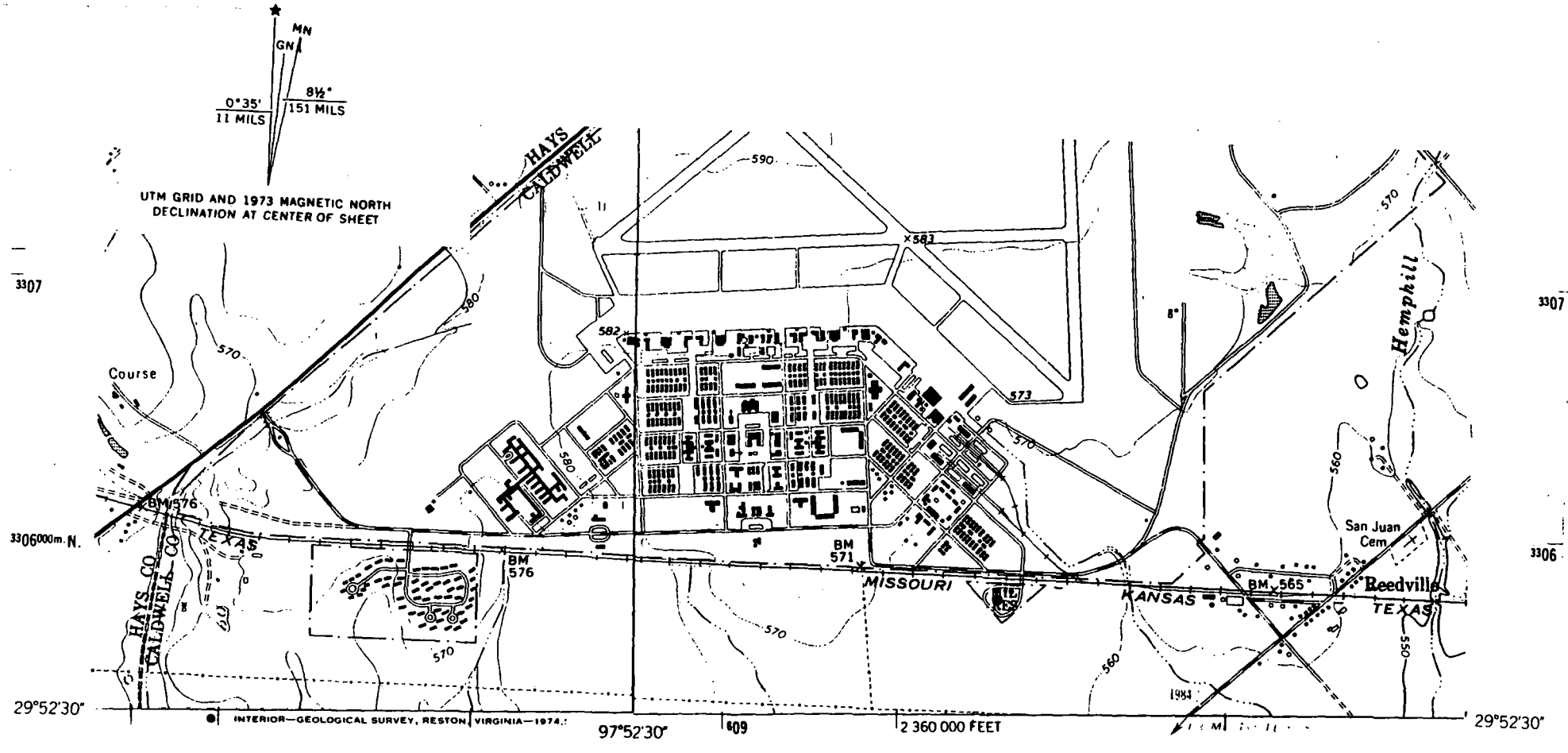
NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

ATTACHMENT A

POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT SUPPLEMENT SHEET

Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-2.

Corresponding number on form	Additional Remark and/or Explanation
II, B, 4	FIT recommends a low priority site inspection to verify test results, spill location and size, effects of Tetraethyl lead on ground water in the area, landfill covering, etc.
V, C, 4	The electrical power transformers were observed to be leaking and the soil was stained. Remedial action has taken place since April 9, 1985. The transformers which were stored in a fenced storage yard have been moved to a warehouse with a curbed floor. Gary Job Corps Center, through the Dept. of Labor, has let bids to test the fluids and label the transformers. The bids are being processed for award in DOL, Washington, D.C. office. Tentative plans call for those transformers which are still serviceable and test positive for PCB, be used for service. Those transformers which are not serviceable and test positive for PCB, will be disposed of in an approved manner. There are no transformers leaking at present. Those transformers which were leaking on April 9, 1985, were tested for PCB and were found not to contain PCB. General Services Administration representatives have visited the site and consider the buried tetraethyl lead as non hazardous. The manufacturer of the tetraethyl lead, when contacted by the Job Corps Center has also addressed the burial as non hazardous.
IX, B, 1	Inspection conducted under Executive Order 12088 by Jim Highland, P.E., Federal Facilities Compliance Coordinator (6ES-FA) April 9, 1985, EPA. Report on file at the EPA.
X, B, 1	Gary Job Corps Center is addressing the electrical power transformers through testing and labeling of the transformers. The contract for this action is in the process of award.



GARY JOB CORPS CENTER

San Marcos, TX

Caldwell County

SAN MARCOS NORTH, TEX.
N2952.5-W9752.5/7.5

1964
PHOTOREVISED 1973
AMS 6443 IV NW-SERIES V882

lat. 029° 53' 07"

long. 097° 52' 15"

TX1161630644

F06-8704-18

UHLAND, TEX.
N2952.5-W9745/7.5

1964
PHOTOREVISED 1973
AMS 6443 IV NE-SERIES V882

UNI[illegible] STATES ENVIRONMENTAL PROT. [illegible]TION AGENCY

DATE APR 1 8 1985

SUBJECT Pollution Control Screening at Gary Job Corps Center, San Marcos, Texas

FROM Jim Highland, P.E.
Federal Facilities Compliance Coordinator (6ES-FA)

TO File, Gary Job Corps Center, San Marcos, Texas

On Tuesday, April 9, 1985, I visited the subject Federal Facility to survey pollution control facilities and activities relative to implementation of Executive Order 12088 and the requirements of the environmental laws administered by EPA. This survey is part of a regional initiative to screen significant minor Federal Facilities (FF) not currently in the sphere of FF receiving regular compliance inspections by the State and/or EPA. These surveys are intented to surface any obvious or apparent problems needing correction or warranting closer investigation through follow-up compliance inspections. The visits are informal and consultative in nature and this report should not be interpreted as a formal finding of actual compliance status.

Gary Job Corps Center (GJCC) is located on 817 acres of land approximately 1 mile northeast of San Marcos, Texas on State Highway No. 21. It is a residential vocational training center for economically pressed youth who have dropped out of school and are unable to find jobs. It provides vocational training in 24 areas of the building, construction, manufacturing and automotive trades, service occupations and special programs. Basic education courses are also provided in support of the vocational training. Current GJCC population is approximately 2,500 resident and 600 non-resident. GJCC has its own power, natural gas and water distribution and sewage collection and disposal systems. Solid waste collection and disposal and pesticide control services are contracted to outside firms. Air, solid waste and wastewater emissions sources include dormitories and other residences, service and educational buildings, dining halls, shops (carpentry, sheet metal, welding, machine, printing, automotive and heavy equipment repair), heavy equipment operation and storage and transfer facilities for automotive and diesel fuel.

My primary contacts and guides for the survey were Mr. Dick Moncure, Environmental Coordinator, and Mr. Mo Gloria. During the screening, I identified no apparent problems in the areas of air and water pollution control under the CAA and CWA, RCRA waste handling and disposal, pesticides use and handling, nor their activities covered under the Safe Drinking Water Act. However, I did note the following apparent violations or potential problems connected with their CERCLA and TSCA activities:

1. CERCLA (Superfund) Activities.

Since December, 1964, the Job Corps has occupied a part of a former military air base of WWII vintage (1943), and GJCC personnel have little information concerning possible hazardous materials and waste handling and disposal activities of the former military tenants. Mr. Moncure told me he was there for a while before the Job Corps took over their portion, and he knows there was some landfilling being done at that time. He said he's not sure about any hazardous wastes being buried there during the military operation, but he thinks there may have been some tetraethyl lead buried then. GJCC has also conducted some on-site landfilling, but Mr. Moncure said he knows of no hazardous wastes buried during that time, only refuse, some garbage and some construction and demolition debris. I told him CERCLA and Executive Order 12088 require Federal agencies to review their past activities, determine whether any of those activities are potential hazardous waste problems, and take whatever remedial steps are necessary to eliminate the problems. I suggested he contact the Department of Defense (DOD) Former Sites Program (FSP) to see if they have investigated, or plan to investigate, the problem potential at the Gary facility. If not, GJCC should request a DOD investigation, and any necessary remedial actions, under the FSP.

2. TSCA Regulated Activities.

GJCC has a large number (100+) of electrical power tranformers in service or in storage for either future use, repair or disposal. Many of these transformers were inherited from the former military owners, and Job Corps personnel have no information whether or not any of them contain PCBs. GJCC has set up no PCB records system, labeled no transformers, tested no dielectric fluid, nor attempted to confirm the existence of PCBs. Some transformers sitting in a storage yard were observed to be leaking and oil stains were visible on the ground. Most of the transformer nameplates observed either had no information as to type of dielectric or were not clear whether the fluid could be PCB-contaminated. I recommended they immediately implement a program to determine the presence of PCBs in those transformers not currently in service, especially those which are leaking, and set up the required PCB records system if necessary. I also suggested they may need to provide a regulation storage facility for some of their transformers. Mr. Moncure advised me that they have already ordered some test kits to begin testing transformers for PCBs and will provide labeling, recordkeeping and storage as necessary to comply with PCB regulations, if PCBs are found.

CONCLUSION: It appears that immediate future follow-up activity in connection with the GJCC may appropriately be limited to monitoring the progress of (1) necessary CERCLA investigations and/or remedial actions to confirm fulfillment of CERCLA responsibilities and (2) the Center's efforts to assure compliance with the PCB regulations. The need for an early follow-up TSCA compliance inspection will be left to the judgement of the regional TSCA enforcement program. No immediate follow-up visits are recommended for the other media programs at this time.

cc: McKee, 6AW-SC
Mount, 6AW-P
Frey, 6AW-AE
Ferguson, 6W-EC
Brown, 6AW-HC
Murphy, 6AW-PP
Graham, 6W-SP